



**NADY SYSTEMS, INC.**

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Federal Communications Commission  
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In the matter of:

Notice of Proposed Rule Making	)	ET Docket No. 97-157
Reallocation of TV Channels 60-69,	)	FCC 97-245
the 746-806 MHz Band	)	FR Doc. 97-20078

**COMMENTS OF:**

John Nady  
President, Head Engineer  
Nady Systems, Inc.  
6701 Bay Street  
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Nady Systems, Inc. hereby files these comments on October 7, 1997 concerning the reallocation of TV Channels 60-69, the 746-806 MHz and as stated in the recently released Notice of Proposed Rule Making (Et Docket No. 97-157, FCC 97-245, and FR Doc. 97-20078) The FCC proposal dedicates 24 MHz for Public Safety use and calls for the remaining 36 MHz to become available for mixed, mobile, and broadcasting uses on a competitive basis. Nady Systems is a manufacturer of professional wireless audio products which operate within the 746-806 MHz band which have type approval from the Federal Communications Commission (FCC).

**SUMMARY**

Nady requests that Lower Power Auxiliary Stations (LPAS), which operates in the 746-806 MHz band be included in this proceeding. Wireless audio systems operating as Lower Power Auxiliary Stations (LPAS), presently use this band.



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Because of the low number of full power television broadcasting stations operating in this range, it has been well-suited for this purpose. Nady Systems Inc. is very concerned over the possible loss of the wireless audio spectrum particularly since there are no dedicated protected frequencies in the United States that are suitable for high-quality, multi-channel UHF wireless system operation. Experience has shown that once allocations are lost, they may never be recovered. In addition, the FCC's proposal did not specify what would happen to existing Low Power Auxiliary Station (LPAS) users when the proposed rules become effective.

## DISCUSSION

Wireless audio systems operating in the television broadcasting channels operate on a secondary, non interference basis as low power Auxiliary Stations (LPAS) licensed by the FCC. Experience has shown that this arrangement works well, and it is practical to share TV spectrum with lower power narrow band transmitters. The 746-806 MHz band has proven particularly well-suited for LPAS operation due to the relatively low number of power television stations operating in this part of the spectrum.

The FCC has proposed, in the this Notice of Proposed Rule Making (NPRM), to reallocate 24 MHz of the 746-806 MHz band for public safety. In addition it has proposed to allocate the remaining 36 MHz to the fixed, mobile, and broadcasting services and to offer licenses on a competitive basis. As a result, LPAS users could find their operations partially or entirely displaced by this rule making.

Nady is concerned by the omission of Lower power Auxiliary Stations (LPAS) from this proceeding. Since LPAS equipment is an integral part of news gathering we propose that the FCC should consider the impact of this proceeding on broadcasting stations.

In addition, Nady proposes that LPAS operation should be given the same secondary non-interference status that they presently have during the transition period to digital television. This action will pose minimal interference to public



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safety operations. This will also allow time for existing LPAS users to modify their equipment for operation on other bands not used by public safety, or recover a portion of their investment and prevent disruption of LPAS operation. Upon the conclusion of the digital TV transition period, Nady proposes that LPAS operation be allowed to continue to operate permanently on the remaining 36MHz spectrum not assigned to public safety (e.g. 746-764 and 776-794 MHz) and share bands with TV broadcasting.

## CONCLUSION

For the reasons stated above, Nady Systems, Inc. requests that Lower Power Stations (LPAS), which currently operate in the 746-806 MHz band, be included in this proceeding. In addition, Nady requests that LPAS equipment continue to be permitted operate in this band on a secondary, non-interference basis throughout the duration of the digital television transition period. Nady further requests, in the case that LPAS operations are retired from the new exclusive public safety segments of 764-776 and 794-806 MHz at the conclusion of the digital TV transition period, that LPAS equipment be permanently assigned to operate in the non public safety segments of 746-764 and 776-794 MHz on a secondary, non-interference basis.